

**EXHIBIT A - PROPOSED DATES**

<b>Action</b>	<b>Date</b>
Defendants' Answer	October 25, 2017
Exchange of Rule FRCP 26 Initial Disclosures	November 15, 2017
Class Certification Motion	February 15, 2018
Opposition to Class Certification Motion	May 15, 2018
Reply in support of Class Certification Motion	July 15, 2018
Substantial completion of document production (with the exception of documents relating to class certification, which shall be produced earlier on a schedule to be negotiated by the parties)	May 1, 2018
Deadline to join additional parties and amend pleadings	July 20, 2018
Fact Discovery Cutoff	November 13, 2018
Deadline for Opening Expert Reports	December 21, 2018
Deadline for Opposing Expert Reports	February 22, 2019
Deadline for Rebuttal Expert Reports	April 8, 2019
Expert Discovery Cutoff	May 8, 2019
Deadline to file Dispositive Motion(s) and motions to exclude expert testimony under Daubert and/or FRE 702	June 21, 2019
Opposition(s) to Dispositive Motion(s) and motions to exclude expert testimony under Daubert and/or FRE 702	August 9, 2019
Reply in support of Dispositive Motion(s) and Dauber motions to exclude expert testimony under Daubert and/or FRE 702	September 6, 2019
Hearing on dispositive motions (motion cutoff)	October 4, 2019
Final Pretrial Conference	November 4, 2019
The parties will confer with the Court regarding trial date, trial schedule, and pre-trial motions at the Final Pretrial Conference.	